

## REMARKS

Reconsideration and allowance of the subject application are respectfully requested.

Claims 23-31, 33-50, and 52-61 are pending.

Claims 23-24, 26-31, 33-39, 42-43, 45-50, 52-57 and 59 stand rejected under 35 U.S.C. §102(e) as being anticipated by Yamagishi. Applicants respectfully traverse this art grounds of rejection.

In making this art grounds of rejection, the Examiner reads the specific data on Yamagishi's GOP, and reads the relative position data on the position information in a GOP discussed in column 18, lines 28-33 of Yamagishi. As disclosed in column 18, lines 28-33 of Yamagishi,

Recorded in all sectors in which Nth GOP is recorded as the I frame access data is the first sector No. In which for example, each I frame of the N+1th, N+3th, N+5th, N-5th, N-3th, and N-1th GOP is recorded. A wide range of special reproduction as described later can be carried out using less data as described.

By contrast, claim 23 recites "each specific data includes the associated relative position data," and "each of the relative position data ... indicative of a plurality of relative positions from a current nth specific data location to each of a n+1, n+2, ..., n+m specific data location, where m is greater than 2."

Because of the relative position data as recited in claim 23, a jump can be made directly to a specific data location which is two (i.e., n+2) specific data

locations from the current specific data location. This is not the case in Yamagishi. In Yamagishi, two jumps would have to be made in order to get to a GOP which is two GOPs from a current GOP.

As demonstrated above, claim 23 is not anticipated or rendered obvious to one skilled in the art by Yamagishi.

Independent claims 33, 42, 52 and 60 include similar limitations to those discussed above with respect to claim 23. Therefore, these claims are patentable at least for the reasons discussed above with respect to claim 23.

The remaining claims rejected based on Yamagishi are dependent on one of the above discussed independent claims, and are therefore patentable at least for the reasons stated above with respect to those independent claims.

Applicants respectfully request that the Examiner withdraw this art grounds of rejection.

Claims 25 and 44 stand rejected under 35 U.S.C. §103 as being unpatentable over Yamagishi in view of Naimpally. Also, claims 40-41 and 58 stand rejected under 35 U.S.C. §103 based on Yamagishi in view of the Examiner's Official Notice. Applicants respectfully traverse these art grounds of rejection.

From even a cursory review of Naimpally and the Examiner's Official Notice, it is readily apparent that Naimpally and the Examiner's Official Notice do not overcome the disclosure and suggestion deficiencies of Yamagishi with

respect to independent claims 23, 33, 42, 52 and 60. These claims are patentable over Yamagishi in view of Naimpally and Yamagishi in view of the Examiner's Official Notice. As such, claims 25, 44, 40-41 and 58, dependent upon on one of the independent claims, are at least patentable for the reasons stated above with respect to these independent claims.

Applicants respectfully request that the Examiner withdraw this art grounds of rejection.

Claims 23, 27-30, 33-34, 36-39, 42, 46-49, 52-53, 55-57 and 59 stand rejected under 35 U.S.C. §102(e) as being anticipated by DeHaan. Applicants respectfully traverse this art grounds of rejection.

DeHaan discloses a video disk with reference information for slow motion or freeze playback. As disclosed in column 5 of DeHaan, a video block stored on the video disk includes a reference field. In one embodiment, the reference field points to the location of the current video block. In another embodiment, the reference field points not only to the current video block, but also to the next video block. Accordingly, at most, the reference field points to the  $n$ th and the  $(n+1)$ th video blocks.

By contrast, claim 23 recites "each specific data includes the associate relative position data," and "each of the plurality of relative position data ... indicative of a plurality of relative positions from a current  $n$ th specific data location to each of a  $n+1$ ,  $n+2$ , ...,  $n+m$  specific data locations, where  $m$  is

greater than 2." Therefore, DeHaan does not anticipate or render claim 23 obvious to one skilled in the art.

Independent claims 33, 42, 52 and 60 include similar limitations to those discussed above with respect to claim 23. Therefore, these independent claims are patentable at least for the reasons stated above with respect to claim 23.

The remaining claims rejected by the Examiner are dependent claims, dependent upon one of the above discussed independent claims. Therefore, these dependent claims are patentable at least for the reasons stated above with respect to the independent claims.

Applicants respectfully request that the Examiner withdraw this art grounds of rejection.

Claims 24-25, 31, 35, 43-44, 50 and 54 stand rejected under 35 U.S.C. §103 as being unpatentable over DeHaan in view of Naimpally, and claims 26, 40-41, 45 and 58 stand rejected under 35 U.S.C. §103 as being unpatentable over DeHaan in view of the Examiner's Official Notice. Applicants respectfully traverse this art grounds of rejection.

From even a cursory review of Naimpally and the Examiner's Official Notice, it is readily apparent that Naimpally and the Examiner's Official Notice do not overcome the disclosure and suggestion deficiencies of DeHaan with respect to independent claims 23, 33, 42, 52 and 60. These claims are

patentable over DeHaan in view of Naimpally and DeHaan in view of the Examiner's Official Notice. As such, claims 24-25, 31, 35, 43-44, 50 and 54, dependent upon on one of the independent claims, are at least patentable for the reasons stated above with respect to these independent claims.

Furthermore, with respect to claim 24, it should be noted that in DeHaan, the reference data points to a video block regardless of whether that video block includes I frame data or not (the Examiner's attention is drawn to column 6, line 56 - column 8, line 9). There is no disclosure or suggestion in Naimpally or the Examiner's Official Notice that the reference field in DeHaan should only contain position information pointing to video blocks including I frame data. Therefore, DeHaan alone, DeHaan in view of Naimpally or DeHaan in view of the Examiner's Official Notice cannot anticipate claims 24, 35, 43 and 54.

Applicants respectfully request that the Examiner withdraw this art grounds of rejection.

Applicants note with appreciation the Examiner's indication that claims 1-22 are allowed.

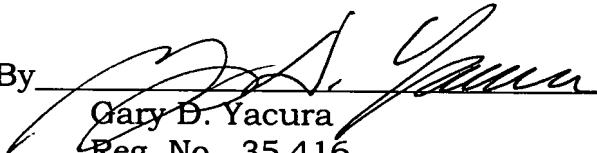
In view of the above, it is believed that this application is in condition for allowance. A favorable action in the form of a Notice of Allowance is earnestly solicited.

In the event that any outstanding matters remain in this application, Applicant requests that the Examiner contact Gary D. Yacura (Reg. No. 35,416) at (703) 205-8071 to discuss such matters.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Very truly yours,

BIRCH, STEWART, KOLASCH & BIRCH, LLP

By   
Gary D. Yacura  
Reg. No. 35,416

GDY:jcp

P.O. Box 747  
Falls Church, VA 22040-0747  
(703) 205-8000